

EXHIBIT**Attachment 1****THE WEINSTEIN GROUP, P.C.**

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June 27, 2022

SCHOENTHALER LAW GROUP
 3200 Windy Hill Road, Suite 1600 E
 Atlanta, Georgia 30339
 Attn: Peter F. Schoenthaler, Esq.

Re: Vaeso, Inc. v. High Peak Software, Inc.
 Civil Action No. 22-cv-01220-PAE

Counselor:

We have just completed our “meet and confer” and I am truly disappointed at your dismissive tone and adamant refusal to amend the Defendant’s discovery demands at 17, 20, 21, 22, 23, 24, 25, 26 and 27.

During our call, I expressed to you my concern of your use of the words “any”, “all” and “every” advising that the demands as written were overly broad, encompassed irrelevant information and were not proportionate to the claims or the defenses. I expressed to you the objection that the time period reflected in the demands (if there was one) goes beyond the time scope of the claims or defenses and seeks information which is unrelated to the issues. Given your client’s efforts to monetize Vaeso’s property, I asked that demands be narrowed to be limited to “the Services” and “the Deliverables” which you refused. I articulated two (2) instances in which my client had verification of efforts by your client to usurp my client’s property.

I do not believe that the Defendant has engaged in a good faith meet and confer by the unilateral refusal to narrow the scope of any of the demands. Nor did you even represent that you would re-read the demands to see if they could be narrowed. I intend to oppose any motion to compel, and to seek a protective order over my client’s confidential operations and relationships that are not related to the issues herein.

I urge you to reconsider your position and to amend the demands to be more narrow and limited in time, place and scope.

Very truly yours,
 THE WEINSTEIN GROUP, PC



LLOYD J. WEINSTEIN, Esq.
 (Rule §130-1.1a) (NYS Tech Law §304(2))